

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Jaroslaw Mielewczyk  
Debtor

SN Servicing Corporation as  
servicer for U.S. Bank Trust  
National Association, as Trustee of  
the LB-Cabana Series IV Trust  
Movant  
v.

Jaroslaw Mielewczyk  
Kamila I. Mielewczyk- Co-Debtor  
Kenneth E. West Trustee  
Respondents

Case No.: 21-10727-amc

Chapter: 13

Judge: Ashely M. Chan

Hearing Date: April 26, 2022 at 11:00 am

Objection Deadline: April 12, 2022

**NOTICE OF MOTION FOR RELIEF FROM  
AUTOMATIC STAY AND CO-DEBTOR STAY**

SN Servicing Corporation as servicer for U.S. Bank Trust National Association, as Trustee of the LB-Cabana Series IV Trust has filed a Motion for Relief from Stay and Co-Debtor Stay with the Court in order to gain Court authority to foreclose on real property known as 614 Iva Lane, Fairless Hills, PA 19030.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the Court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before April 12, 2022 (14 days after the date the notice was mailed) you or your attorney must do all of the following:

(a) file an answer explaining your position at

Clerk of Court  
United States Bankruptcy Court  
Robert N.C. Nix, Sr. Federal Courthouse  
900 Market Street, Suite 400  
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney:

Lauren M. Moyer, Esquire  
Friedman Vartolo, LLP  
1325 Franklin Avenue, Suite 160  
Garden City, NY 11530  
T: (212) 471-5100  
F: (212) 471-5150  
[Bankruptcy@FriedmanVartolo.com](mailto:Bankruptcy@FriedmanVartolo.com)

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Ashely M. Chan on the 26th day of April 2022, at 11:00 A.M., at Robert N.C. Nix Sr. Federal Courthouse, 900 Market Street, Philadelphia, PA 19107.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

Dated: March 29, 2022

By: /s/ Lauren M. Moyer  
Lauren M. Moyer, Esquire  
FRIEDMAN VARTOLO LLP  
Attorneys for Movant  
1325 Franklin Avenue, Suite 160  
Garden City, New York 11530  
T: (212) 471-5100  
[Bankruptcy@FriedmanVartolo.com](mailto:Bankruptcy@FriedmanVartolo.com)

TO:

**Trustee**

Kenneth E. West  
Office of the Chapter 13 Standing Trustee  
1234 Market Street - Suite 1813  
Philadelphia, PA 19107

**Debtor's Counsel**

Brad J. Sadek, Esquire  
Sadek and Cooper  
1315 Walnut Street  
Suite 502  
Philadelphia, PA 19107

**U.S. Trustee**

United States Trustee  
Office of the U.S. Trustee  
200 Chestnut Street  
Suite 502  
Philadelphia, PA 19106

**Debtor**

Jaroslav Mielewczyk  
614 Iva Lane  
Fairless Hills, PA 19030

**Co-Debtor**

Kamila I. Mielewczyk  
614 Iva Lane  
Fairless Hills, PA 19030